

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

T-MOBILE US, INC. ET AL.,

Defendants.

**Case No. 2:20-cv-281-JRG**

**JURY TRIAL DEMANDED**

**JOINT MOTION TO STAY AND NOTICE OF SETTLEMENT**

Plaintiff KAIFI LLC (“KAIFI”) and Defendants T-Mobile US, Inc. and T-Mobile USA, Inc. (“Defendants” or “T-Mobile”) have reached a settlement in principle to resolve the claims asserted in this case between them. Accordingly, pursuant to this Court's Standing Order Regarding Proper Notification of Settlement to the Court and subject to this Court’s approval, KAIFI and T-Mobile request that the Court stay all deadlines for thirty (30) days so that appropriate dismissal papers may be submitted upon finalization of a written settlement agreement. KAIFI and T-Mobile anticipate filing a stipulation of dismissal within 30 days.

Date: December 1, 2021	<u>/s/ Robert Christopher Bunt</u>  Robert Christopher Bunt Texas Bar No. 00787165 PARKER, BUNT & AINSWORTH PC 100 E. Ferguson St., Suite 418 Tyler, Texas 75702 Telephone: (903) 531-3535 Email: rcbunt@pbatyler.com
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Date: December 1, 2021	<p><u>/s/ Melissa R. Smith (with permission)</u></p> <p>Josh A. Krevitt  New York Bar No. 2568228  Benjamin Hershkowitz  New York State Bar No. 2600559  Katherine Q. Dominguez  New York Bar No. 4741237  Paul J. Kremer  New York Bar No. 4900338  GIBSON, DUNN &amp; CRUTCHER LLP  200 Park Avenue  New York, New York 10166-0193  Telephone: (212) 351-4000  Facsimile: (212) 351-4035  jkrevitt@gibsondunn.com</p>

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**CERTIFICATE OF SERVICE**

I certify that the foregoing document was filed electronically on December 1, 2021 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Robert Christopher Bunt  
ROBERT CHRISTOPHER BUNT

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), the undersigned met and conferred with opposing counsel and this motion is being filed as a joint motion.

/s/Robert Christopher Bunt  
ROBERT CHRISTOPHER BUNT

**CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL**

I hereby certify that under L.R. CV-5(a)(7)(B) that the foregoing document is filed under seal pursuant to the Court's Protective Order entered in this matter (Dkt. No. 80).

/s/ Robert Christopher Bunt  
ROBERT CHRISTOPHER BUNT